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Contra, Tolle v. Alley, 15 Ky. L. Rep. 529, 24 S. W. 113. Furthermore, when the vendee has complied with the recording requirements, his rights will not be prejudiced by the fact that the recorder's negligence has misled purchasers. *Bigelow v. Topliff*, 25 Vt. 273. Nor can his title be made defeasible by the recorder's intentional unauthorized act. See *Robben v. Benson*, 173 Pac. (Cal.) 766. The principal case introduces a still different situation, but the decision seems to follow logically from the above principles. It is true that the defendant is equally as innocent as the plaintiff, but the plaintiff has done everything that was by statute required of him to render his prior lien indefeasible and should be protected.

RIGHT OF PRIVACY — STATUTORY INTERPRETATION — USE OF PICTURE IN NEWS FILM AND POSTERS. — A statute prohibited the use without consent of a person's name or picture "for advertising purposes or for the purposes of trade." The plaintiff had become famous as a detective by solving a murder mystery. The defendant Film Company in its weekly film of current events showed actual photographs of the plaintiff at work, and also showed her picture and name on certain posters used to announce the subjects presented in the weekly film. *Held*, that this was not a violation of the statute. *Humiston v. Universal Film Mfg. Co. et al.*, 178 N. Y. Supp. 752.

This statute has been held not applicable to the publication of a picture as news in a newspaper or a magazine. *Jeffries v. New York Evening Journal*, 67 Misc. 570, 124 N. Y. Supp. 780; *Coyler v. Richard K. Fox Pub. Co.*, 162 App. Div. 297, 146 N. Y. Supp. 999. Similar interpretation seems called for in the case of publication in weekly news films. These are quite distinct from photoplays, to which the statute has been held applicable. *Binns v. Vitagraph Co.*, 210 N. Y. 51, 103 N. E. 1108. The statute appears to be too broadly worded and restrictive interpretation justified. The posters present a more difficult problem. But granted that the statute should be interpreted as not applicable to the publication of news, it seems clear that it would not apply either to cases where the picture used as news is shown merely as a sample of the news of which it forms a part, as when a newspaper company shows its pictorial supplement in its show window. Therefore the principal case seems correct as to both the films and the posters.

For a further discussion of the principles of restrictive interpretation involved herein, see NOTES, p. 721, *supra*.

SOVEREIGN — PREROGATIVE OF THE ENGLISH CROWN AND COMPENSATION AS A MATTER OF RIGHT. — During the war the Crown took over a large hotel for administrative purposes connected with the war. The owner claimed compensation as a matter of right. The Crown resisted (1) on the ground of the prerogative, and (2) on the basis of the several Defense of the Realm Acts. *Held*, that the plaintiff is entitled to recover as a matter of right. *De Keyser Hotel v. The King*, [1919] 2 Ch. 197 (Court of Appeal).

For a discussion of this case, see NOTES, p. 711, *supra*.

STATUTE OF FRAUDS — INTERESTS IN LANDS — ORAL CONTRACT TO PROCURE MORTGAGEE OF LAND. — The plaintiff desired to borrow money upon the security of a certain tract of land. The defendant, his financial agent, orally contracted to find a mortgagee within a reasonable time, but failed to do so. The trial judge ruled that the contract was to create an interest in land and so unenforceable under the Statute of Frauds. *Held*, that the judgment of the trial court be affirmed. *Dalgety & Co. v. Gray*, [1919] Vict. L. R. 586 (Privy Council).

It is generally held that an undertaking to procure a purchaser of land is not within the Statute of Frauds. *Hannan v. Prentis*, 124 Mich. 417, 83